

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re:****FREE SPEECH SYSTEMS, LLC,****DEBTOR.**

§  
§  
§  
§  
§  
§

**Case No. 22--60043**

**(Subchapter V Debtor)  
Chapter 11**

**WITNESS AND EXHIBIT LIST  
FOR HEARINGS ON DECEMBER 19, 2022**

Judge:	Hon. Christopher M. Lopez
Hearing Date:	Monday December 19, 2022
Hearing Time:	3:00 p.m. (CT)
Party's Name:	Free Speech Systems, LLC
Attorney's Name:	Raymond W. Battaglia,
Attorney's Phone:	(210) 601-9405;
Nature of Proceeding:	Hearing on: <ul style="list-style-type: none"> <li>• Motion to Authorize the Use of Cash Collateral [Docket No. 6]</li> <li>• Second Motion for Extension of Time to File a Plan of Reorganization [Docket No. 299]</li> </ul>

The Law Offices of Raymond W. Battaglia (the “**Battaglia Firm**”), bankruptcy counsel for Free Speech Systems, LLC (the “**Debtor**”) in the above-captioned chapter 11 case (the “**Chapter 11 Case**”), hereby submit this witness and exhibit list in connection with the hearings to be held on Monday, December 19, 2022, at 3:00 P.M. (Central Time) (the “**Hearing**”) on the

**WITNESSES**

The Debtor may call any of the following witnesses at the Hearing, whether in person or by proffer:

1. Patrick Magill, Chief Restructuring Officer of Free Speech Systems, LLC;
2. Any witnesses necessary to establish notice of the Hearing has been provided; and

3. Any witnesses necessary to rebut the testimony of any witnesses called or designated by any other parties.

### **EXHIBITS**

The Debtor may offer for admission into evidence any of the following exhibits at the hearing:

<b>Ex.</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted /Not Admitted</b>	<b>Disposition</b>
1	4-Week Cash Collateral Budget				

The Debtor reserves the right to supplement, amend or delete any witness and exhibits prior to the Hearing. The Debtor also reserves the right to use any exhibits presented by any other party and to ask the Court to take judicial notice of any document. The Debtor finally reserves the right to introduce exhibits previously admitted.

Respectfully submitted December 15, 2022.

LAW OFFICES OF RAY BATTAGLIA, PLLC

/s/ RAYMOND W. BATTAGLIA  
 Raymond W. Battaglia  
 State Bar No. 01918055  
[rbattaglia@outlook.com](mailto:rbattaglia@outlook.com)  
 66 Granburg Circle  
 San Antonio, Texas 78218  
 Tel. (210) 601-9405

*Counsel to the Debtor and Debtor-In-Possession*

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing document was filed with the Court and served electronically upon those parties registered to receive electronic notice via the Court's CM/ECF system.

/s/ Raymond W. Battaglia  
Raymond W. Battaglia